

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION**

SEDRIC CATCHINGS *et al.*,
Plaintiffs,

v.

CALVIN WILSON *et al.*,
Defendants.

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Case No.: 1:21-cv-00428-TSE

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**JOINT STATUS REPORT REGARDING
EXECUTED SETTLEMENT AGREEMENT**

After weeks of negotiation, a day-long settlement conference with Magistrate Judge Michael S. Nachmanoff on April 5, execution of a Memorandum of Understanding in anticipation of settlement on April 6, a follow-up phone mediation with Judge Nachmanoff on April 13, and an additional day of negotiation between the parties, the parties have reached a Settlement Agreement. This Agreement is attached hereto as Exhibit A, and the incorporated Terms Sheet is attached as Exhibit B. The Terms Sheet tracks the previously agreed upon Memorandum of Understanding between the parties that was endorsed by Judge Nachmanoff, with some clarifications and elaboration agreed to by the parties.

A few steps remain prior to the Plaintiffs filing a consent motion for dismissal, with a request that the Court retain jurisdiction for enforcement.

First, the parties will be concurrently filing a joint motion to vacate deadlines and hearings and to deny all pending motions as moot, with the exception of Plaintiffs' Motion to Seal (ECF No. 11), to which Defendants now consent, as well as a narrow issue raised in Plaintiffs' Motion to Compel (ECF No. 63).

Second, as to the Motion to Compel, the parties still require the assistance of Judge

Nachmanoff in resolving the terms of the confidentiality agreement that will govern the Settlement Agreement and incorporated Terms Sheet. This issue has been briefed in Plaintiffs' Motion to Compel (ECF No. 63-1 at p. 14) and in Defendants' Opposition thereto (ECF No. 69 at 5-6). The parties request that they be allowed to use the discovery hearing scheduled for tomorrow, April 16, to resolve this narrow issue.

Third, Plaintiffs will be filing a consent motion for class certification for settlement purposes only, per the Settlement Agreement. The parties have consented to Magistrate Judge Nachmanoff presiding over issues leading up to Plaintiff's consent motion for dismissal and defer to this Court as to which judicial actor will preside over this set of issues.

Dated: April 15, 2021

Respectfully submitted,

/s/ Alec W. Farr

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